



U.S. Fish and Wildlife Service
2524 S. Frontage Road, Suite C
Vicksburg, Mississippi 39180-5269
601-629-6604
Fax 601-636-9541

May 26, 2000

Colonel Robert Creer
District Engineer
U.S. Army Engineer District, Vicksburg
4155 Clay Street
Vicksburg, Mississippi 39183-3435

Dear Colonel Creer:

I am writing to address coordination necessary in fulfilling our respective Fish and Wildlife Coordination Act responsibilities for the Yazoo Backwater Area Project. Shortly after the first of the year, your staff briefed us on the current schedule (which calls for a report to be released to the public in June). We discussed milestones for our receiving the results of your environmental, economic, and hydrologic analyses as well as a preliminary draft of your report. As normally occurs, this information would provide the basis for our preparing a draft FWCA report that would be attached to your report at the time of public release. This schedule called for our receiving copies of your economic, environmental, and hydrologic analyses in mid-February and an advance copy of your preliminary draft report shortly after its submittal to division in mid-March. We then agreed to providing a preliminary draft FWCA report in mid-April as the basis for our participation in the Feasibility Review Conference with OCE.

Our concern is that although these key coordination milestones have fallen by the wayside, the June schedule for public release is unchanged. We received the various environmental appendices May 3 (approximately 3 months later than scheduled) with a request that our comments be provided by June 9. We responded with comments on May 19. To date we have not received the results of economic and hydrologic analyses and more importantly we have not had the benefit of a preliminary draft of your report to assess the underlying analyses and rationale for treating non-structural alternatives and features and for arriving at the tentatively selected plan. As the Service has indicated previously, our position on this project hinges not simply on pumping elevation and the extent of reforestation associated with any particular plan but rather the extent to which this project reflects new directions in the traditional structural only approach of the Mississippi Rivers and Tributaries Project. Presuming that your meeting with OCE earlier this week served as the Feasibility Review Conference, it occurred without the benefit of FWCA input from the Service and consideration of our policy-level concerns. While I appreciate the complexities and controversies associated with this project over the past few months, these complexities have had the unintended consequence of less rather than more coordination. The positive and productive coordination we have enjoyed with the Vicksburg District seems to have been held in abeyance pending Division and OCE review and analysis. Such would be workable if study schedules were adjusted accordingly.

The Fish and Wildlife Service will provide a draft Coordination Report to you within 60 days of receiving your draft report. Pending your receipt of our report and an appropriate period of consideration and analysis as required by the FWCA, we believe it would not be in keeping with the equal consideration provisions of the FWCA to release your report for public review and comment. (Moreover, you will be receiving a letter shortly from our Jackson Office expressing similar concerns relative to Endangered Species Act coordination.) Both our agencies have benefitted from positive and productive coordination on this project. It seems however that when needed the most; we are coordinating the least. We look forward to receiving your report and a resumption of coordination.

Sincerely,

Signed

Charles K. Baxter
Yazoo Pumps Project Team Leader